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Of Attorneys for Defendant Pat Merina

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

MICHAEL HUDGINS,	)	
	)	
Plaintiff,	)	Case No. CV 02-6040-TC
	)	
vs.	)	DEFENDANT PAT MERINA'S SECOND
	)	SUPPLEMENTAL WITNESS LIST
CITY OF ALBANY, PAT MERINA, DON	)	
O'MALLEY, PHIL McLAIN, JOE W.	)	
SIMON,	)	
	)	
Defendants.	)	
	)	

12. **Hughes, Ross.** Ross Hughes was a Captain and part of Merina's management staff. Hughes will testify about his participation in the Sergeant Promotion process that occurred in 1999-2000, and about his observations of that process and its impartiality. He will also testify about plaintiff's conduct, and about appropriate conduct for police officers, particularly relating to matters of insubordination.

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Hughes will also testify about his investigation of the 1995 incident involving Sergeant Dale White and Rollins, a juvenile who was temporarily held in custody at the Albany Police Department.

DATED this 17<sup>th</sup> day of September, 2004.

MILLER & WAGNER LLP

By: /s/ Stan LeGore  
Stan LeGore, OSB #94369  
Of Attorneys for Defendant  
Pat Merina

Trial Attorney:  
Robert S. Wagner, OSB #84411

CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> day of September, 2004, I served the foregoing DEFENDANT PAT MERINA'S SECOND SUPPLEMENTAL WITNESS LIST, on the following parties at the following addresses:

Martha Lee Walters  
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by CM/ECF and mailing to them a true and correct copy thereof, certified by me as such, placed in a sealed envelope addressed to them at the addresses set forth above, and deposited in the U.S. Post Office at Portland, Oregon, on said day with postage prepaid.

/s/ Stan LeGore  
Stan LeGore